CHRISTOPHER A. SEEGER NI NY STEPHEN A. WEISS NY DAVID R. BUCHANAN NU NY DIOGENES P. KEKATOS NY MOSHE HORN NI NY JONATHAN SHUB CAPA

MICHAEL L. ROSENBERG A NI NY MARC S. ALBERT A NY DONALD R. BRADFORD 4 OK JAMES A. O'BRIEN III A MA NY

^ COUNSEL Attorneys admitted in states as denoted.

SEEGER WEISS LLP

ATTORNEYS AT LAW One William Street New York, NY 10004 (212) 584-0700 FAX (212) 584-0799 www.seegerweiss.com

RICK BARRECA NI NY TERRIANNE BENEDETTO NI FA KEVIN G. BOISVERT NO PO PATRICIA D. CODBY N SINDHUS. DANIEL MENUPA DENNIS M. GEIER NI NY SCOTT A. GEORGE N I'A JEFFREY S. GRAND NY LAURENCE V, NASSIF NI NY ANDREA M. PI-SUNYERNY DENISE K. STEWART N CHRISTOPHER M. VAN DE KIEFT NY DANIEL R. WASP NINY RICHARD C. WILLIAMS, JR. NJ

Vía Facsimile (212-805-7920)

The Honorable Shira A. Scheindlin United States District Judge United States Courthouse 500 Pearl Street New York, NY 10007

May 19, 2008 RECEIVED HAMBERS OF HISDC SDNY 1 9 2008 DOCUMENT ELECTRONICALLY TILEPUNGE SCHEINDLIN DCC 称 DATE FILED:

Waldman, et al. v. Wachovia Corp., et al.

Case No. 08cv2913 (SAS)

Request to File PSLRA Motion for Lead Plaintiff without Conference

Dear Judge Scheindlin:

My firm, along with the firms listed below, represent investors who wish to file a motion for appointment as lead plaintiff in the above-referenced action. Pursuant to the Private Securities Litigation Reform Act of 1995 ("PSLRA"), this motion must be made by any class member who intends to seek appointment as a lead plaintiff, whether or not the class member previously has filed a complaint, not later than 60 days following the publication of the first notice that was issued advising investors of the pendency of these actions. See 15 U.S.C. § 78u-4(a)(3)(A) and (B). Based upon the date of the publication of notice of the pending class action, lead plaintiff motions are due today, May 19, 2008.

The Court's Individual Practices require the parties to have a pre-motion conference with the Court before filing most motions. Because of the deadline imposed by the PSLRA, and the fact that we are unaware of which other class members may be moving for appointment as lead plaintiff, we respectfully request leave from complying with this practice so that we may file our oppointnehl as lead plaintiff may made without the new for a prenote for a prenote for the conference for home.

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The Honorable Shira A. Scheindlin United States District Judge May 19, 2008 Page 2

As per the Stipulation executed by the parties and entered by the Court on April 30, 2008, defense counsel was aware of the undersigneds' intent to move on behalf of their client(s) for a motion to be appointed as lead plaintiff(s) and that an Amended Complaint will be filed once a Lead Plaintiff and Lead Plaintiff Counsel are selected.

Respectfully,

a. Wirospas Stephen A. Weiss SEEGER WEISS LLP

Daniel C. Girard

GIRARD GIBBS LLP

Norman E. Siegel STUEVE SIEGEL HANSON LLP

Attorneys for Plaintiff

cc: Brian A. Herman, Esq.

> 101 Park Avenue New York, NY 10178

Telephone: 212-309-6909

(via facsimile and email - 212-309-6001 and bherman@morganlewis.com)

SW/tab